

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company, and AMAZON  
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as  
“REKK,” and the following individuals: Oscar  
Pineda, Janiyah Alford, Noah Page, Skylar  
Robinson, William Walsh, Luke Colvin,  
Alejandro Taveras, Andrew Ling, Brandon  
Sukhram, Charalampos Gkatzoulas, Cosmin  
Sopca, Dylan Hinz, Eric Niezabytowski, Graham  
Ferguson, Ivona Brazovskaja, James Garofalo,  
Jenny Tran, Johanes Kessel, Jorge Correa, Josh  
Davis, Karcper Niepogoda, Olaf Booij, Ryan  
Bates, Sai Charan Beeravelli, Simone Antonio  
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT  
INJUNCTION AS TO  
DEFENDANT KACPER  
NIEPOGODA AND PROPOSED  
ORDER

NOTED FOR CONSIDERATION:  
April 11, 2024

*Without Oral Argument*

**STIPULATION**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,  
Inc. (together, “Amazon”), and Defendant Kacper Niepogoda (“Niepogoda”) and (collectively  
“Settling Parties”), by and through Amazon’s respective counsel of record and by Niepogoda’s

1 pro-se representation, notify the Court that the Settling Parties have reached a settlement of all  
2 claims between them in this matter. Pursuant to the terms of that settlement, the Settling Parties  
3 stipulate and agree to entry of the permanent injunction below.

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STIPULATED PERMANENT INJUNCTION  
AS TO DEFENDANT NIEPOGODA (23-cv-01879-JLR) - 2

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

DATED this 9th day of April, 2024.

Davis Wright Tremaine LLP  
Attorneys for Plaintiffs

Defendant

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DocuSigned by:  
Kacper Niepogoda  
Kacper Niepogoda  
Phone: +31641896401  
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**PERMANENT INJUNCTION**

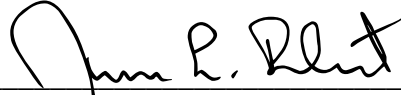
Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that Defendant Kacper Niepogoda, and his respective employees, agents, successors and assigns, and all others in active concert or participation with him, are permanently enjoined and restrained from:

1. Accessing and using, whether directly or indirectly via a third party, intermediary, or proxy, Amazon.com, or any other Amazon online store around the world;
2. Exploiting or abusing Amazon's ordering or return services;
3. Making false statements or misrepresentations to Amazon;
4. Engaging in any activity that defrauds Amazon into paying money or providing replacement products for illegitimate returns;
5. Engaging in any scheme or malicious activity that interacts with Amazon; and
6. Knowingly and materially assisting or engaging any other person or business entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of  
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent  
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: April 12, 2024.

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9 The Honorable James L. Robart  
10 UNITED STATES SENIOR DISTRICT JUDGE  
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